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May 14, 2014

<u>VIA E-MAIL EMAIL:CHAMBERSNYSDSEIBEL@NYSD.USCOURTS.GOV</u> VIA ECF:

The Honorable Cathy Seibel United States District Judge Southern District of New York 300 Quarropas Street White Plains, New York 10601-415

Re:

The Wave Studio, LLC v. General Hotel Management Ltd., et al.

Civil Action No.: 13-cv-9239 (S.D.N.Y.) Letter Motion for Extension of Time

Dear Judge Seibel:

Clausen Miller P.C., represents the following defendants in the above referenced action: Tripadvisor, LLC/ tripadvisor.com; About.com, Inc.; Frommer Media/ frommers.com; NetAdvantage.com d/b/a IHSAdvantage.com; Metro Travel Guide d/b/a Metrotravelguide.com; This Exit, LLC d/b/a RoadsideAmerica.com; Bookit.com, Inc.; Kayak Software Corp. / Kayak.com; Expedia, Inc./ expedia.com; Travelocity.com LP/ Travelocity.com; Hotels.com GP LLC/ hotels.com; JetBlue Airway Corporation/ jetblue.com; Fareportal, Inc. d/b/a Cheapoair.com; Lonely Planet Global, Inc./ lonelyplanet.com; Getaroom.com; Farebuzz d/b/a farebuzz.com; collectively ("the Defendants").

Currently, the first deadline for one of the above named Defendants to answer or otherwise respond to Plaintiff's First Amended Complaint ("Complaint") (Document 7) is Friday, May 16, 2014, with others to follow days later. We have made numerous attempts to secure a collective extension to answer for the Defendants, but Plaintiff has not yet responded either way. Pursuant to Local Civil Rules 5.2(b) and 7.1(d), we write to request that the Court extend the Defendants' time to answer or otherwise respond to the Complaint until June 20, 2014. The requested extension will allow the Parties to engage in settlement discussion toward an amicable resolution of this action and/or answer or otherwise respond on the same date.

This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaint.



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Respectfully submitted,

CLAUSEN MILLER, P.C.

By:

Carl M. Perri, Esq.

CMP:mm

Cc: All Counsel Of Record, via ECF